

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	
)	JUDGE DAN AARON POLSTER
v.)	
)	
SOUTH UNIVERSITY OF OHIO, LLC,)	MAGISTRATE JUDGE
<i>et al.</i>)	THOMAS M. PARKER
)	
Defendants.)	

**UNOPPOSED MOTION TO INTERVENE BY STUDENT
INTEVENORS, THE DUNAGAN PLAINTIFFS**

Pursuant to Rule 24 of the Federal Rules of Civil Procedure, Emmanuel Dunagan, Jessica Muscari, Robert J. Infusino and Stephanie Porreca, plaintiffs and named representatives in a proposed class action pending in the Circuit Court of Cook County, Illinois against the Illinois Institute of Art LLC, the Illinois Institute of Art-Schaumburg, LLC, and Dream Center Education Holdings LLC, three of the entities in receivership, hereby move the Court to intervene in this action.

No counsel for any party in the case has indicated they will interpose any objection to this Motion.

The reasons for the Motion are set forth in the accompanying Memorandum. A copy of the Proposed Order approving the request to intervene is attached to the Memorandum.

/s/ Richard S. Gurbst

Richard S. Gurbst (Bar # 0017672)

Eleanor M. Hagan (Bar # 0091852)

SQUIRE PATTON BOGGS (US) LLP

4900 Key Tower

127 Public Square

Cleveland, Ohio 44114

Telephone: +1 216 479 8500

E-mail: *richard.gurbst@squirepb.com*

Eric Rothschild

(Admitted Pro Hac Vice)

Alexander S. Elson

(Admitted Pro Hac Vice)

NATIONAL STUDENT LEGAL DEFENSE NETWORK

1015 15th Street NW, Suite 600

Washington, DC 20005

Telephone: +1 202 734 7495

E-mail: *alex@nsldn.org*

eric@nsldn.org

Counsel for Proposed Intervenors,

Emmanuel Dunagan, Jessica Muscari,

Robert J. Infusino and Stephanie Porreca

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing Unopposed Motion to Intervene was served upon all parties of record by the Court's electronic filing system this 6th day of February, 2019.

/s/ Richard S. Gurbst
Richard S. Gurbst
One of the Attorneys for Proposed Intervenors